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Attorneys for North Shore Bank, FSB

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IN THE UNITED STATES DISTRICT COURT DISTRICT OF ARIZONA

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NORTH SHORE BANK, FSB, a Federal Savings Bank,

Plaintiff,

Defendant.

VS.

DARREL KEUCK, an individual,

JPMORGAN CHASE BANK, NA,

JEWIOROAN CHASE BANK, NA

Garnishee.

Cause No. 2:15-mc-00044

APPLICATION FOR JUDGMENT ON GARNISHMENT

(U.S. District Court, District of Utah, Central Division; Case No. 2:14-cv-00834-DAK)

Pursuant to A.R.S. §12-1584(a), Judgment Creditor North Shore Bank, FSB ("North Shore"), the Judgment Creditor herein, requests that this Court enter a Judgment against Garnishee JPMorgan Chase Bank, NA ("Garnishee") on Garnishee's *Answer of Garnishment* (the "Answer") in the amount of \$2,229.50 (the "Answer"). Garnishee was served with the Writ of Garnishment (the "Writ"), and filed its Answer on August 3, 2015. Garnishee's Answer stated that pursuant to the Writ, it is holding \$2,229.50 of monies from the account of **Darrel Keuck.** A true and correct copy of the Answer is attached hereto as **Exhibit "A"** and by this reference incorporated herein.

There has been no objection to the Writ or the Answer. Accordingly, pursuant to A.R.S. §12-1584(a), North Shore is entitled to Judgment against Garnishee in the amount of \$2,229.50, as disclosed by Garnishee in its Answer. North Shore respectfully requests that this Court enter Judgment against Garnishee, as requested herein, in the form submitted herewith.

	1	DATED this 21 st day of August 2015.
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	6	
	7	COPY of the foregoing mailed
	8	COPY of the foregoing mailed this 21 st day of August 2015 to:
	9	JPMorgan Chase Bank, NA Claims Dept.
	10	PO Box 183164 Columbus, Ohio 45218
	11	Darrel Keuck
017	12	7504 East Christmas Cholla Drive Scottsdale, Arizona 85255
ona 85	13	
Phoenix, Arizona 85012	14	/s/ Brandi R. Watson
	15	
<u> </u>	16	
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ENGELMAN BERGER, P.C.

By /s/ Wade M. Burgeson
Wade M. Burgeson
3636 North Central Avenue, Suite 700
Phoenix, Arizona 85012
Attorneys for Plaintiff Wells Fargo Bank, N.A.

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EXHIBIT "A"

(Answer of Garnishee)

ı	Case 2:15-mc-00044 Document 12 F	iled 08/03/15 Page 1 of 4					
		N FILED LODGED					
		RECEIVED COPY					
1	Wade M. Burgeson, SBA #015650 Engelman Berger, P.C	AUG 0 3 2015					
2	3636 NORTH CENTRAL AVENUE, SUITE 700 PHOENIX, ARIZONA 85012	CLERK U.S. DISTRICT COURT DISTRICT OF ARIZONA					
3	Ph: (602) 271-9090 Fax: (602) 222-4999	BY DEPUTY					
4	Email: wmb@eblavyecs.com						
5	Attorneys for North Shore Bank, FSB						
6	IN THE UNITED STAT	TES DISTRICT COURT					
7	DISTRICT	OF ARIZONA					
8	2.2						
9	NORTH SHORE BANK, FSB. a Federal Savings Bank,	Cause No. 2.15-mc-00044					
10	Plaintiff, vs.	ANSWER OF GARNISHMEN'T (Non-Earnings)					
12	DARREL KEUCK, an individual,						
13	Defendant.	(U.S. District Court, District of Utah, Central Division, Case No. 2:14-cy-00834-DAK)					
14	JPMORGAN CHASE BANK, NA,						
15	Garnishee.						
16	I am the above named Garnishee or am authorized by the Garnishee to make this affidavit on its behalf, regarding the Writ of Garnishment served on Garnishee on this date: 07/23/2015						
17	Yes	□ No					
18 19	2. Was the Garnishee indebted to or otherwise in possession of monies of Darrel Keuck ("Judgment Debtor") at the time the Writ was served?						
20	Yes	☐ No					
21	3. What is the total amount of indebtedness or monies of the Judgment Debtor in the possession of Garnishee at the time the Writ was served? \$						
23 24	4. What is the total amount of indebtedness or monies of the Judgment Debtor withheld by the Garmshee pursuant to the Writ? \$						
25 26	5. What is the amount of indebtedness or monies of the Judgment Debtor not withheld by the Garnishee, and the reason for not withholding?						
27	a. Amount of indebtedness not withheld. \$_375.00						
	{0005317.0000/00602356,DOC / }						

		Case 2:15-mc-00044 Document 12 Filed 08/03/15 Page 2 of 4
	1	b. Reason for not withholding \$300.005 fatu tory exemption \$75.00 Processing fee
	2	\$ 75.00 Nocessing fee
	3	6. At the time the Writ of Garnishment was served upon Garnishee, did Garnishee have possession
	4	of personal property of the Judgment Debtor?
	5	☐ Yes ☑ No
	6	If yes, describe each item, or group of items, of personal property.
	7	
	8	7 Please list all items of personal property withheld by the Garnishee pursuant to the Writ:
	9	None
	10	8. Based upon Garnishee's knowledge, is another person or entity indebted to the Judgment Debtor, or in possession of personal property of the Judgment Debtor?
L, P.C. Suite 700 12	11	☐ Yes No
ER, F 1e, Sui 5012	12	If yes, give name and addresses:
ERGI Avenu zona 8	13	
ENGELMAN BERGER, P 3636 North Central Avenue, Suil Phoenix, Arizona 85012	14	9. If Garnishee is a corporation, does Judgment Debtor have now, or at the time the Writ was served, any stocks, bonds, options or other interest in the corporation?
BLM,	15	
36 NG 36 NG	16	
36	17	10. Did Garnishee Answer 'yes' to either questions #2 or #6? Yes No
	18	
	19	If yes, copies of the Writ and Summons, underlying Judgment, Notice to Judgment Debtor and Request for Hearing were delivered to the Judgment Debtor on 07/29/15
	20	by hand delivery:
	21	regular first class mail to the address determined to be best calculated to
	22	reach the Judgment Debtor in a timely manner
	23	service pursuant to the Rules of Civil Procedure applicable to a Summons. Copies of this Approximent Debtor, the
	24	Copies of this Answer were delivered on 7/29/2015 to the Judgment Debtor, the Judgment Creditor or its attorney, if applicable, at the following addresses:
	25	Judgment Creditor North Shore Bank, FSB
	26	c/o Wade M. Burgeson ENGELMAN BERGER, P.C. 3636 North Central Avenue, Suite 700
	27	Phoenix, Arizona 85012
		{0005317.0000/00602356,DQC / }
		. 2

	ľ	Case 2:15-mc-00044 Document 12 Filed 08/03/15 Page 3 of 4	
	ı	Judgment Debtor Darrel Keuck 7504 East Christmas Cholla Drive	
	2	Scottsdale, Arizona 85255	
	3	by hand delivery	
	4	regular first class mail to the address determined to be the best calculated	
	5	to reach the Judgment Debtor in a timely manner;	
	6	service pursuant to the Rules of Civil Procedure applicable to a Summons.	
	7	12. Garnishee's name, address and telephone number are: The year Chafe bonk NA	
	8	10 box 182)(4	
	9	Polymbus OH 45218	
	10	W. Control of the Con	
ENGELMAN BERGER, P.C 3636 North Central Avenue, Suite 700 Phoenix, Arizona 85012	11	13. I have read the foregoing document and know of my own knowledge that the facts stated therein are true and correct.	
ENGELMAN BERGER, P.C 536 North Central Avenue, Suite? Phoenix, Arizona 85012	12	WHEREFORE, Garnishee prays that Garnishee be discharged on this Answer and that the	
SRGE venus	13	Court award Gamishee reasonable compensation in the amount of \$	
N BE Ital A Ariza	14	AMANPREET SINGH	
MA) h Cer benix	15	Gamishee (PRINT)	
VGEI Nord Ph	16	(Signature of Gamishee or Authorized Agent)	
E)	17	STATE OF ARIZOTA AS) Document Review Specialist	
	18	County of Maricopa 45.	
	19	SUBSCRIBED TO AND SWORN before me this 29 day of 2015.	
	20	SUBSCRIBED TO AND SWORN before me this	
	21	Votary Public	
	22	COPY of the foregoing mailed/delivered	
	23	this 39 day July 2015 to: JONATHON PFORTMILLER Notary Public, State of Texas My Commission Expires Wade M. Burgeson	
	24	Engelman Berger, P.C.	
	25	3636 North Central Avenue. Suite 700 Phoenix, Arizona 85012	
	26		
	27		
		(0005317,0000/00602356.DOC/) 3	
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UNITED STATES DISTRICT COURT DISTRICT OF ARIZONA 401 WEST WASHINGTON STREET STE 130 SPC 1 PHEONIX 85003-2118	